

CENTENNIAL COMMUNICATIONS

3349 Route 148, Building A
Wall, New Jersey 07719
732-556-2200

August 2, 2004

David Solomon, Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

John Muleta, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Eighth Quarterly Report of Centennial Communications Corp.
On E911 Compliance**

Dear Messer's Solomon and Muleta:

Pursuant to the FCC's Order to Stay issued in CC Docket No. 94-102,¹ Centennial Communications Corp. ("Centennial") hereby files its eighth and final Quarterly Report detailing our progress in deploying Phase I and Phase II enhanced 911 ("E911") service in our markets. Because Centennial provides CMRS service in two distinct markets, this report is divided into two sections -- the first explaining the status of Phase II E911 deployment in Puerto Rico, and the second part reports on Phase II E911 deployment in our domestic markets. In addition, we are attaching the Excel spreadsheet detailing our E911 implementation status.²

I. Puerto Rico/U.S. Virgin Islands

Centennial Puerto Rico License Corp., a subsidiary of Centennial, holds the B block broadband PCS license for MTA 25 – Puerto Rico/US Virgin Islands. Centennial has chosen a network-based solution to deploy Phase II E911 in this MTA. A single PSAP serves Centennial's entire Puerto Rican service area. On November 4, 2003, Centennial received a request for Phase I and II E911 service from this sole PSAP. Centennial and the PSAP had been working towards deploying both Phase I and Phase II E911 service in Puerto Rico by July 15, 2004. However due to persistent equipment compatibility problems between Centennial and the

¹ FCC 02-210, released July 26, 2002.

² See *Public Notice, Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, DA 03-1902, released June 6, 2003.

PSAP, the parties agreed to extend the Phase II deployment target until August 20, 2004. At present, Phase I service has been implemented and Phase II service is in testing mode.

Centennial also provides service to the U.S. Virgin Islands of St. Croix and St. Thomas under its B Block license for MTA 25. Each island is served by a single PSAP; however neither PSAP has made a request to Centennial for either Phase I or Phase II E911 service.

II. Domestic Markets

Through five different subsidiaries,³ Centennial holds licenses to provide digital cellular service in 30 markets in the Midwest and Southern United States. Centennial provides cellular service in the following six states: Indiana, Louisiana, Michigan, Mississippi, Ohio and Texas. Centennial has chosen a network-based solution offered by Andrew Corporation to deploy Phase II E911 in its domestic markets.⁴

Phase I Service – Centennial continues to make significant progress initiating Phase I service to PSAPs. As we have previously reported, Centennial continues to receive PSAP requests for Phase I E911 service and we continue to implement Phase I service as valid requests are received. Phase I E911 service has been fully deployed in our Texas markets, and as of August 2004, Phase I E911 service was fully deployed to all PSAPs in Indiana and Louisiana where Centennial operates and for which requests have been submitted. Presently, we have only six pending requests for Phase I service, all of which are in Michigan and all of which have experienced technical difficulties in implementing Phase I. We are actively working with the PSAPs and relevant carriers to resolve these implementation difficulties. Centennial also notes that we still have not received any valid requests for Phase I (or Phase II) E911 service from PSAPs in the state of Ohio.

Phase II Service - As the Commission is aware, we are implementing Andrew Corporation's "Geometrix" network overlay solution for E911 Phase II compliance in our domestic markets.⁵ As detailed in the attached Excel spreadsheet, since the filing of our last quarterly report, we have activated Phase II service in five additional markets in Indiana and one market in Michigan. We are actively working on deploying Phase II service to nine additional PSAPs (we expect to go "live" to five of these nine PSAPs in August and September, 2004), and we anticipate receiving requests for Phase II service from five more PSAPs in the next quarter. Finally, we have received "invalid" requests for Phase II service from seven PSAPs (five of which are located in Indiana, and one each in Louisiana and Michigan.)

As we have previously reported, Centennial still has not received any Phase II E911 service requests from PSAPs in Mississippi, Ohio or Texas. In Indiana, we continue to work

³ Baucé Communications of Beaumont, Inc., Centennial Michiana License Company LLC, Centennial Southeast License Company LLC, Elkhart Metronet, Inc. and Lafayette Cellular Telephone Company.

⁴ See Centennial Communications Corp. Amended Report on E911 Reporting Requirements, filed September 9, 2002.

⁵ *Id.*

with the Indiana Enhanced Wireless 911 Board and its Cost Recovery Group (“Indiana Board”) in coordinating Phase II E911 deployment, and with the PSAPs in Indiana that have not yet perfected their Phase II requests. Centennial continues to negotiate mutually acceptable deployment target dates with each PSAP that has submitted a valid request for Phase II service when circumstances dictate that deployment cannot be accomplished within six months from our receipt of a valid request. In addition, we continue to work cooperatively with these PSAPs when we encounter issues that result in delays to the previously-negotiated mutually acceptable deployment dates.

In sum, because Centennial has negotiated mutually acceptable Phase II implementation schedules with each of the PSAPs in its domestic markets that had submitted valid Phase II requests,⁶ Centennial presently is in compliance with all applicable Phase II deployment benchmarks.

III. Affidavit

I hereby declare under penalty of perjury that the information provided in this response is true and accurate to the best of my knowledge, information and belief.

If you have any questions regarding this report, or require additional information, please contact me, or Terry Cavanaugh at Cole, Raywid & Braverman, LLP, counsel for Centennial, at 202-828-9857.

Sincerely,

/s/ William Roughton

William Roughton
Vice President, Legal and Regulatory Affairs
Centennial Communications Corp.

cc: Thera Bradshaw, President
Association of Public-Safety Communications
Officials-International, Inc.
351 N. Williamson Blvd.
Daytona Beach, FL 32114

John R. Melcher, ENP, President
National Emergency Number Association
422 Beecher Road
Columbus, OH 43230

⁶ See Order on Reconsideration, Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson, Texas, FCC 02-318, released November 26, 2002

Evelyn Bailey, President, NASNA
94 State Street, Drawer 20
Montpelier, VT 05620-6501

Robert M. Gurss
Director, Legal & Government Affairs
APCO International
1725 DeSales Street, NW, #808
Washington, DC 20036

James R. Hobson
Miller & Van Eaton, PLLC
1155 Connecticut Avenue, NW, Suite 1000
Washington, DC 20036
Counsel for NENA and NANSA